

# EXHIBIT 8

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**From:** [Oot, Patrick L. \(SHB\)](#)  
**To:** [Evan M. Janush](#); [Maier, Jonathan E.](#)  
**Cc:** [Shoshtari, Adam M. \(SHB\)](#); ["Anthony Irpino"](#); [Fuller, Mike](#); [Tom Egler](#)  
**Subject:** RE: SOM Report Referenced at Teva IQVIA 00004558  
**Date:** Thursday, August 6, 2020 1:19:09 PM  
**Attachments:** [image003.png](#)

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Hi Evan.

We located the document and provided it to counsel to follow the process that we used in the original production.

I copied Jonathan Maier who can help navigate that process.

Best,

Patrick

**Patrick Oot**  
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**From:** Evan M. Janush <[Evan.Janush@LanierLawFirm.com](mailto:Evan.Janush@LanierLawFirm.com)>  
**Sent:** Wednesday, July 29, 2020 1:12 PM  
**To:** Oot, Patrick L. (SHB) <[OOT@shb.com](mailto:OOT@shb.com)>  
**Cc:** Shoshtari, Adam M. (SHB) <[ASHOSHTARI@shb.com](mailto:ASHOSHTARI@shb.com)>; 'Anthony Irpino' <[airpino@irpinolaw.com](mailto:airpino@irpinolaw.com)>; Fuller, Mike <[mike@mchughfuller.com](mailto:mike@mchughfuller.com)>; Tom Egler <[TomE@rgrdlaw.com](mailto:TomE@rgrdlaw.com)>  
**Subject:** SOM Report Referenced at Teva IQVIA 00004558

## EXTERNAL

Dear Patrick:

I hope this e-mail finds you to be well. I am writing concerning a narrow and specific production issue arising from IQVIA's document production pursuant to Discovery Ruling No. 15 in MDL 2804 ("DR-15").

Plaintiffs seek a suspicious order monitoring ("SOM") report drafted by Cegedim following a 9/8/2011 Cegedim site visit at Watson Pharmaceuticals. As shown below, this SOM report was transmitted by Cegedim employee Robert Williamson (an agreed IQVIA e-mail custodian) to at least one Watson Pharmaceuticals (now Allergan/Actavis/Teva) employee at 9:07 a.m. on 9/22/2011. However, this SOM report was not included in IQVIA's production and we hereby request a copy of same.

For background and identification, IQVIA produced a 9/22/2011 email chain involving Robert Williamson which shows that he sent the SOM report to Tom Napoli at Watson Pharmaceuticals (now Allergan/Actavis/Teva), copying IQVIA employee Paul Hambly, among others. Attached is a copy (Teva\_IQVIA\_00004558-9). This email chain included 3 emails. The top email (i.e., most recent) in the chain was sent by Mr. Williamson at 9:37 a.m. on 9/22/2011. The bottom email in the chain is Mr. Williamson's initial email (from 9:07 a.m.) which states: "[p]lease find attached a follow up report from our visit to Watson on September 8th." See Teva\_IQVIA\_00004558-9, attached hereto. Unfortunately, the email chain IQVIA produced does not include the SOM report since the report was sent with the bottom email and not the top email.

We are concerned that during a de-duplication process or due to some other production issue, IQVIA's DR-15 production may have inadvertently removed or otherwise failed to capture the initial email in this string, together with the attached SOM report.

Prior to bringing this matter to you, we have searched the remainder of IQVIA's production and have not located this SOM report. Given the fact that Mr. Williamson forwarded the SOM report with his 9/22/2011 (9:07 am) email, we are asking IQVIA to produce same. We believe that our request is both narrow and specific, and we do not believe that this will be a difficult task. However, if there are any questions or if you would like to discuss any of the above, we are happy to meet and confer with you at your convenience.

Respectfully,  
Evan Janush



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